



July 24, 2025

Via ECF and Fax

The Honorable Alvin K. Hellerstein
United States Courthouse
500 Pearl Street, Room 1050
New York, NY 10007
Fax: (212) 805-7942

The parties' proposed extended deadlines are approved. The status conference scheduled for August 22, 2025 is adjourned to November 21, 2025 at 10:00 a.m.

SO ORDERED.

7.24.25 /s/ Alvin K. Hellerstein

Re: *Sooncha Kim v. CIMG Inc.*, Case No. 1:24-cv-7485 (AKH) – Joint Letter Request for Extension of Time for Discovery Deadline and Adjournment of Settlement Conference and Second Case Management Conference

Dear Judge Hellerstein:

The parties jointly submit this request for an extension of time for the discovery deadline and settlement conference, and adjournment of the case management conference.

Per the Case Management Plan dated February 28, 2025 (Dkt. # 36), the parties agreed that non-expert discovery would be completed by July 31, 2025. A settlement conference between counsel was set to occur on August 13, 2025. The Second Case Management Conference is scheduled for August 22, 2025. This is the first request for an extension of deadlines of the Case Management Plan and for an adjournment of the Second Case Management Conference.

The parties exchanged initial disclosures, served document demands, and produced documents responsive to those requests. In addition, the parties served and answered interrogatories and Defendant responded to Plaintiff's Requests for Admission. With respect to the written discovery, counsel for Defendant requested and received from Defendant's prior corporate counsel, BakerHostleter, its files relating to Plaintiff. The files received were voluminous and counsel for Defendant has been diligently reviewing the documents, and intends to make a supplemental document production shortly. Once written discovery is complete, the parties will schedule and conduct party depositions. Scheduling depositions have been complicated by the fact that the witnesses are in Korea and China, and counsel are in New York and Washington. The requested extension, in addition to providing the necessary time to complete written discovery, will permit the parties to schedule and conduct party depositions.

As discovery is ongoing and the parties continue to work to set deposition dates, the parties have agreed to and respectfully request a 90-day extension of all deadlines per the Case Management Plan. The new deadlines agreed upon are to complete non-expert discovery by October 31, 2025, and to conduct a settlement conference between counsel on November 12, 2025. The parties defer to Your Honor to schedule a Second Case Management Conference, but based on the current Case Management Plan, propose November 21, 2025.

Respectfully Submitted,

FEINSTEIN LAW, P.C.

/s/ Todd Feinstein

Todd Feinstein, Esq.
1710 Doe Run Rd.
Sequim, Washington 98382
619-990-7491
todd@feinsteinlawfirm.com
Attorneys for Plaintiff, Pro Hac Vice

THE LAW OFFICES OF KAREN L. BERNSTEIN, PLLC

Karen L. Bernstein

Karen L. Bernstein, Esq.
80 Church Street, Unit 5B
Tarrytown, New York 10591
914-374-3110
karen.kblaw@gmail.com
Attorneys for Plaintiff, Local Counsel

SICHENZIA ROSS FERENCE CARMEL LLP

Andrew B. Zinman

Andrew B. Zinman Esq.
azinman@srfc.law

Wynee Ngo

Wynee Ngo, Esq.
wngo@srfc.law

1185 Avenue of the Americas, 31st Floor
New York, New York 10036
212-930-9700
Attorneys for Defendant CIMG Inc.